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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

Faustino Patricio,

Plaintiff,

v.

Innovis Data Solutions, Inc.; Bank of
 America, N.A.; and JPMorgan Chase
 Bank, NA,

Defendants.

Case No. 2:22-cv-00709-APG-DJA

**JOINT MOTION AND PROPOSED
 ORDER TO EXTEND TIME FOR
 JPMORGAN CHASE BANK, NATIONAL
 ASSOCIATION TO RESPOND TO
 PLAINTIFF'S COMPLAINT**

(First Request)

The response of Defendant JPMorgan Chase Bank, National Association ("Chase") to Plaintiff Faustino Patricio's Complaint (ECF No. 1) was due May 31, 2022. Chase has requested, and Plaintiff has agreed, that Chase have up to and including July 12, 2022 to respond to Plaintiff's Complaint, to provide time for Chase to investigate Plaintiff's allegations and to prepare a response.

The deadline for Chase to respond to Plaintiff's Complaint has lapsed. Although Chase has processes in place for tracking new civil complaints to ensure Chase timely responds to them, this particular complaint, through inadvertence, was not properly tracked. By the time Chase identified the issue, it lacked sufficient time to move for an extension within the May 31 deadline. Therefore, there is excusable neglect for Chase's request and the parties' Joint Motion. *See* LR IA 6-1(a).

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1 This is the first request for an extension, and it is made in good faith and not
2 for purposes of delay.

3 Dated: June 23, 2022

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16 *Attorneys for Plaintiff*

18 **ORDER**

19 IT IS SO ORDERED:

21 
UNITED STATES MAGISTRATE JUDGE

23 DATED: June 24, 2022